

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION, :  
: Plaintiff, : 10 Civ. 3229 (KBF)  
v. : : ECF Case  
FABRICE TOURRE, :  
: Defendant. :  
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**NOTICE OF SEC'S MOTION TO QUASH TOURRE'S RULE 45 SUBPOENA  
SEEKING PRODUCTION OF LAW ENFORCEMENT PRIVILEGE MATERIALS  
THAT THE COURT ALREADY RULED TOURRE COULD NOT OBTAIN**

Pursuant to Rule 45(c)(3)(A)(iii) of the Federal Rules of Civil Procedure and this Court's June 4, 2013 Order (Dkt. 303), the Securities and Exchange Commission moves the Court to quash the trial subpoena that defendant Fabrice Tourre served on the SEC seeking production of irrelevant Wells materials that are protected from discovery by the law enforcement privilege and that the Court already ruled Tourre could not discover. The reasons supporting this motion are stated in the accompanying Memorandum of Law.

Dated: June 26, 2013

Respectfully submitted,

/s/ Christian D. H. Schultz  
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**CERTIFICATE OF SERVICE**

I certify that on June 26, 2013, I directed the foregoing NOTICE OF SEC'S MOTION TO QUASH TOURRE'S RULE 45 SUBPOENA SEEKING PRODUCTION OF LAW ENFORCEMENT PRIVILEGE MATERIALS THAT THE COURT ALREADY RULED TOURRE COULD NOT OBTAIN to be filed using the CM/ECF system, which will send notification of such filing to the following email addresses:

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/s/ Christian D. H. Schultz

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